



**Local Plan**  
Publication Stage  
Representation Form

**Ref:**  
  
**(For official use only)**

**Name of the Local Plan to which this representation relates:**

**South Staffordshire Council  
Local Plan 2018 - 2039**

**Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022**

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	Mr	Mr
First Name	Gregory	Simon
Last Name	Mann	Hawley
Job Title (where relevant)	Senior Land Manager	Director
Organisation (where relevant)	Redrow	Harris Lamb
Address Line 1	c/o Agent	Grosvenor House
Line 2		75-76 Francis Road
Line 3		Edgbaston
Line 4		Birmingham
Post Code		B16 8SP
Telephone Number		0121 455 9455
E-mail Address (where relevant)		simon.hawley@harrislamb.com



## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy DS1 – Green Belt, provides guidance on the approach the local authority has taken to removing land from the Green Belt. It also identifies the changes being made to the Green Belt boundary in the Plan to accommodate the identified development requirements.

As detailed in our representations in respect of the Plans housing requirement, it is our view that the housing requirement is insufficient. Additional land needs to be removed from the Green Belt to accommodate the housing target. Land at Castlecroft should be removed from the Green Belt and allocated for development.

Paragraph 140 of the Framework advises that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to the Green Belt boundary and “have regard to their intended permanence in the long term, beyond the plan period”.

This, in effect, requires local authorities to remove land from the Green Belt and safeguard it for development in order to ensure that the Green Belt is not continually reviewed through each Local Plan review.

The emerging Plan fails this requirement. As detailed in our representations, the amount of land removed from the Green Belt and allocated for development is insufficient. Regardless, there are no safeguarded development opportunities within the Plan. No rationale has been provided for this approach, there is direct conflict with the provisions of the Framework.



As detailed in our representations Redrow’s land interest at Castlecroft should be removed from the Green Belt and allocated for development. However, if this position is not supported the site should be safeguarded as a longer term development opportunity.

Furthermore, 80% of the land within South Staffordshire is within the Green Belt. If any of the allocations do not deliver as expected and a five year housing land supply shortfall occurs, or the Council fails the Housing Delivery Test, it may be necessary for the Council to grant planning permission for unallocated sites in order to ensure a sufficient supply of housing is delivered. This will, however, prove difficult if the development opportunities available to the Council are within the Green Belt. Removing land from the Green Belt and safeguarding it for future development will help avoid this situation arising.

The Plan is inflexible and could result in significant delays in the delivery of much needed market and affordable housing.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan should remove land at Castlecroft from the Green Belt and allocated it for development.

Additional land should be removed from removed from the Green Belt and safeguarded for future development in accordance with provisions of paragraph 140 of the Framework.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Plan is significantly flawed in failing to remove sufficient land from the Green Belt and allocating it for development and by failing to identify safeguarded sites for future development. This is an issue that goes to the heart of the Plan, as it could prevent the delivery of much needed market and affordable housing. It is in direct conflict with the requirements of the Framework. Given the importance of this matter, we would like to appear in front of the Inspector to address this issue.

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

#### **Data Protection**

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to [localplans@sstaffs.gov.uk](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX